

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

SUNG KOOK (BILL) HWANG and
PATRICK HALLIGAN,

Defendants.

Criminal Action No. 22-240 (AKH)

Document Electronically Filed

**NOTICE OF OMNIBUS PRETRIAL
MOTIONS**

PLEASE TAKE NOTICE that Defendants Sung Kook (Bill) Hwang and Patrick Halligan hereby move before the Honorable Alvin K. Hellerstein, United States District Judge for the Southern District of New York, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York 10007, for the entry of an order pursuant to Rules 7(d), 7(f), 12(b)(3)(B), and 12(b)(3)(C) of the Federal Rules of Criminal Procedure dismissing the indictment; striking superfluous allegations in paragraph 8 from the indictment; suppressing evidence seized pursuant to search warrants issued to Mr. Hwang's electronic accounts; ordering the Government to produce a bill of particulars; and ordering the Government to comply with its *Brady* obligations.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendants shall rely upon the accompanying Brief in Support of Pretrial Motions and Declaration of Lawrence S. Lustberg, with exhibits appended thereto.

PLEASE TAKE FURTHER NOTICE that oral argument is requested.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith.

Dated: December 2, 2022

Respectfully submitted,

s/ Lawrence S. Lustberg

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